

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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GARY D. ARONSON, et al., :
Plaintiffs, : No. 1:11-CV-11492-NMG
v. : (Consolidated with No.
ADVANCED CELL TECHNOLOGY, INC., : 1:11-CV-11515-NMG)
Defendant. :
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**ADVANCED CELL TECHNOLOGY'S
ASSENTED-TO MOTION TO EXTEND TIME TO
RESPOND TO SECOND AMENDED COMPLAINTS**

Defendant, Advanced Cell Technology, Inc. ("ACT"), through its undersigned counsel, moves this Court for a short extension of time to respond to the Second Amended Complaints filed by Plaintiffs Gary Aronson and John Gorton, as trustee, Fed. R. Civ. P. 6(b), and as good cause states as follows:

1. Mr. Aronson filed his Second Amended Complaint, with leave of the Court, on November 9, 2012 (ECF No. 59). Mr. Gorton filed his substantively similar Second Amended

Complaint, also with leave of the Court, on November 12, 2012 (ECF No. 60). Thus, all things being equal, ACT's answers or preliminary motions in response to Plaintiffs' Second Amended Complaints would be due on November 23 and November 26, 2012. Fed. R. Civ. P. 15(a)(3).

2. ACT anticipates moving to dismiss certain counts of the Second Amended Complaints. To reduce the volume of filings, the parties have agreed on one set of briefings to address both Plaintiffs' Second Amended Complaints.

3. To address the different filing deadlines, and in light of the upcoming Thanksgiving holiday on Thursday, November 22, and related office closures, ACT asks that the

deadline for responding to Plaintiffs' Second Amended Complaints be extended until November 30, 2012.

4. Messrs. Aronson and Gorton, by their counsel, have assented to this request.

Date: November 14, 2012

Respectfully submitted,

/s/ Jonathan L. Kotlier

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CERTIFICATION PURSUANT TO LOCAL RULE 7.1

I hereby certify that counsel for defendant Advanced Cell Technology, Inc. conferred with counsel for plaintiffs Aronson and Gorton concerning the subject matter of this motion, and Aronson and Gorton have assented to the relief sought herein.

Dated: November 14, 2012

/s/ Jonathan L. Kotlier

CERTIFICATE OF SERVICE

I hereby certify that, on November 14, 2012, this document (filed through the ECF system) will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Date: November 14, 2012

/s/ Jonathan L. Kotlier